

## **Exhibit 6**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to the cases identified on  
Schedules A and B hereto

Master Docket 18-md-2865 (LAK)  
ECF Case

**DEFENDANTS' SECOND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF SKAT**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Civil Rule 26.3 of the Local Rules of the Court, Defendants listed on Schedules A and B, appended hereto, hereby request that SKAT produce the documents described in the Second Request for Production of Documents (the "Requests" and each a "Request") below. The defendants in Schedule B hereby join in the request that SKAT produce the documents described in the First Requests for Production of Documents dated March 7, 2019. SKAT must respond to the Requests fully, in accordance with the definitions and instructions set forth below on or before February 14, 2020, and produce the documents described in the Requests at the offices of Caplin & Drysdale, Chartered, 600 Lexington Ave., 21st Floor, New York, New York 10022 (Attn: Mark D. Allison, Esq. ([mallison@capdale.com](mailto:mallison@capdale.com)) and Zhanna A. Ziering, Esq. ([zziering@capdale.com](mailto:zziering@capdale.com))).

**INSTRUCTIONS AND DEFINITIONS**

For the purpose of the Request, and with respect to each document or item of information requested:

1. Unless otherwise specified, the Requests seek information created, generated, dated, issued, executed, received or in effect during the period from January 1, 2010 to the present.

2. The Requests shall be deemed continuing, to the full extent permitted under the Federal Rules of Civil Procedure, so as to require supplemental responses and production promptly upon your obtaining possession, custody, or control of information not previously provided or produced which is responsive to one or more of the Requests.

3. Each Request set forth herein calls for documents and tangible things in your possession, custody, or control, as well as documents and tangible things in the possession, custody, or control of your representatives, attorneys, agents, servants, employees, investigators, consultants, and counsel. A document or tangible thing is in your "possession, custody and control" if you have the legal right to obtain the document or thing, regardless of its source or present location.

4. If there is a claim of privilege with respect to any document or information requested, please provide all information required by Local Civil Rule 26.2 of the Local Rules (unless divulgence of such information would cause disclosure of the allegedly privileged matter), including: (i) the type of document, *e.g.*, letter or memorandum; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document for a subpoena duces tecum, including, where appropriate, the author of the document, the addressees of the document, and any other recipients shown in the document, and, where not apparent, the relationship of the author, addressees, and recipients to each other.

5. If any responsive document was, but is no longer, in your possession, custody or control, state precisely the disposition of such document.

6. To the extent any responsive document to these Requests relates to a specific Defendant, please separately identify such document and the Defendant to which it relates.

7. These discovery requests incorporate the “Uniform Definitions in Discovery Requests” set forth in Local Civil Rule 26.3 of the Local Rules. Accordingly:

(A) **Communication.** The term “**communication**” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise), whether verbally or in writing, and regardless of form, including electronic communication.

(B) **Document.** The term “**document**” is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

(C) **Identify.** When referring to a person, “**to identify**” means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

(D) **Person.** The term “**person**” is defined as any natural person or any business, legal or governmental entity or association.

(E) **Concerning.** The term “**concerning**” means relating to, referring to, describing, evidencing or constituting.

8. The following rules of construction apply to all discovery requests:

(A) **All/Each.** The terms “**all**” and “**each**” shall be construed as all and each.

(B) **And/Or.** The connectives “**and**” and “**or**” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

(C) **Number.** The use of the singular form of any word includes the plural and vice versa.

9. The words “**referring to**,” “**relating to**,” and “**pertaining to**” are synonymous with “concerning” as defined above.

10. The use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb so used.

11. References to any company or entity include its divisions; its direct and indirect subsidiaries; its merged or acquired predecessors-in-interest (whether or not successorship in liability is admitted); any subsidiaries or divisions of its predecessors-in-interest; and their present or former officers, representatives, agents, servants, attorneys, experts, employees, investigators, consultants, and all other persons acting on behalf of such company or entity, or its predecessors.

12. A request for “all documents concerning” or “all reports concerning” a given subject matter includes, but is not limited to, communications pertaining to that subject matter between SKAT, its representatives, attorneys, agents, servants, employees, investigators, consultants, and counsel, and any other person or entity, including without limitation any governmental agency of the Kingdom of Denmark, any lender, investment banker, asset manager, investment advisor, credit analyst, rating agency, lawyer, accountant, litigation consultant, statistician, economist or other professional; and any other person referred to in the particular discovery request.

13. The following are specially defined terms for which the meanings specified below shall apply:

(A) “**Authorized Representative**” means the persons identified in the attached Schedules A and B in the column titled “Authorized Representative,” and his or her employees, agents, representatives and attorneys.

(B) “**Broker-Custodian**” means the entity or entities identified on the attached Schedules A and B in the column title “Broker-Custodian(s),” and their affiliates, subsidiaries, predecessors, successors, assigns, principals, officers, directors, employees, agents, representatives, and attorneys.

(C) “**Claims**” means any dividend withholding tax refund claims that the Plans submitted to SKAT, including but not limited to, the dividend withholding tax refund claims that the Payment Agent(s) submitted to SKAT on behalf of the Plans, whether such claim is the subject matter of SKAT’s Complaints or the payment of which was denied by SKAT.

(D) “**Complaints**” means the Complaints filed by SKAT in the U.S. federal and state courts in May and June 2018 against the Plans, Authorized Representatives and Other Defendants, and any amended Complaints relating thereto.

(E) “**Credit Advice**” means a credit advice, income advice, tax voucher, or similar document, generated by Broker-Custodian that demonstrates a Plan’s ownership of any Shares or receipt of any Dividends.

(F) “**Dividends**” means the dividends identified in the Claims concerning the Shares.

(G) “**IRS**” means the Internal Revenue Service.

(H) “**Other Defendants**” means the persons identified on the attached Schedules A and B, in column titled “Other Defendants” and their employees, agents, representatives, and attorneys.

(I)     **“Payment Agent(s)”** means the entity or entities identified on the attached Schedules A and B in the column titled “Payment Agent(s),” and their affiliates, subsidiaries, predecessors, successors, assigns, principals, officers, directors, employees, agents, representatives and attorneys.

(J)     **“Plan”** means the entity identified on the attached Schedules A and B in the column titled “Plan” and their affiliates, subsidiaries, predecessors, successors, assigns, principals, officers, directors, employees, agents, representatives, trustees and attorneys.

(K)     **“Refunds”** means any amounts of the withholding tax paid by SKAT pursuant to any Claims.

(L)     **“Shares”** means the shares of Danish stock identified in the Claims.

(M)     **“SKAT”** refers to the Customs and Tax Administration of the Kingdom of Denmark, including its predecessors and successors, and its representatives, attorneys, agents, servants, employees, investigators, consultants, and counsel (including but not limited to Kammeradvokaten).

(N)     **“SOIK”** refers to the Danish Public Prosecutor for Serious Economic and International Crimes, including its predecessors and successors, and its representatives, attorneys, agents, servants, employees, investigators, consultants, and counsel.

(O)     **“You,” “Your” and “Yourself”** refer to the party or non-party to whom the following discovery requests are addressed, and to such party or non-party’s representatives, agents, servants, employees, investigators, consultants, and counsel.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1**

All communications concerning SKAT employee Lisbeth Rømer and SKAT's payment of dividend withholding tax refunds and/or claims to U.S. pension plans.

**REQUEST NO. 2**

All communications concerning SKAT and any Ministry of Taxation employee regarding SKAT's payment of dividend withholding tax refunds and/or claims to U.S. pension plans.

**REQUEST NO. 3**

All communications concerning SKAT or Ministry of Taxation employees Anne Munksgaard, Jim Sørensen, Jens Brøchner, and Andreas Berggreen related to SKAT's payment of dividend withholding tax refunds and/or claims to U.S. pension plans, including but not limited to, any communications involving or testimony provided by these individuals.

**REQUEST NO. 4**

All National Audit Office reports concerning the payment of dividend withholding tax refunds and/or claims, including all documents quoted, cited, or relied on by the National Audit Office reports.

**REQUEST NO. 5**

All reports exchanged between SKAT and the Ministry of Taxation or the Ministry of Finance that discuss or relate to the payment of dividend withholding tax refunds and/or claims, including but not limited to all state income lists and all documents related to the Ministry of Taxation internal audit report dated September 2015 regarding SKAT's administration of dividend withholding tax refunds and/or claims, including all documents quoted, cited, or relied on in the report.

**REQUEST NO. 6**

All communications concerning the Central Accounting Office and SKAT regarding or in any way referring to increases in the volume or value of payments of dividend withholding tax refunds and/or claims between 2013 and 2015.

**REQUEST NO. 7**

All documents exchanged between SKAT and the Ministry of Finance, the Ministry of Taxation, or SØIK that discuss or relate to the payment of dividend withholding tax refunds and/or claims, including any reports or memoranda regarding the viability of possible civil claims.

**REQUEST NO. 8**

All reports not otherwise requested herein concerning the payment of dividend withholding tax refunds and/or claims, including but not limited to, any investigation, report, or analysis drafted or conducted by SKAT regarding the payment of dividend withholding taxes by listed Danish companies to SKAT and dividend withholding tax refunds paid to any claimants.

**REQUEST NO. 9**

All documents received by and/or relied on by SKAT to support the allegation in the complaints that it discovered the alleged fraud in July 2015.

**REQUEST NO. 10**

All documents related to any third-party whistleblower complaints submitted to SKAT in connection with the payment of dividend taxes, including but not limited to, all documents provided by a whistleblower in 2015 from whom SKAT now seeks to obtain testimony through a Request for International Judicial Assistance Pursuant to the Hague Convention, any communications with the whistleblower prior to 2015, and any communications with any whistleblower regarding the payment of dividend withholding tax refunds and/or claims.

**REQUEST NO. 11**

All communications concerning SKAT or the Ministry of Taxation and any foreign governments regarding the payment of dividend withholding tax refunds and/or claims, including any communications with foreign tax authorities.

**REQUEST NO. 12**

All documents prepared by SKAT or any third parties at SKAT's request analyzing withheld dividend reimbursement patterns involving the Plans.

**REQUEST NO. 13**

Documents sufficient to identify SKAT employees responsible for the administration or processing of dividend withholding tax refunds and/or claims between 2012 and 2015.

**REQUEST NO. 14**

Documents sufficient to identify the volume of dividend withholding tax refunds and/or claims processed by each SKAT employee between 2012 and 2015.

**REQUEST NO. 15**

Documents sufficient to identify whom SKAT determined is the actual beneficial owner of the Shares, and whom SKAT determined was the actual recipient of the Dividends.

**REQUEST NO. 16**

All documents related to SKAT's policies and procedures for the administration and payment of withheld dividend tax refunds and/or claims, including but not limited to, policies and procedures regarding the verification of supporting documents submitted by refund claimants in support of their claims, employee protocols for processing such claims, and suggested revisions or modifications to these policies and procedures.

**REQUEST NO. 17**

All documents concerning information technology systems and controls established by SKAT related to the collection and/or payment of withheld dividend tax refunds and/or claims.

**REQUEST NO. 18**

Documents sufficient to identify the aggregate total amount of dividend withholding tax collected by SKAT in connection with each of the dividends declared by the following publicly traded Danish companies at their Annual General Meetings held on the corresponding dates listed in the table below:

<b>Issuer Name</b>	<b>Annual General Meeting Date</b>	<b>Issuer Name</b>	<b>Annual General Meeting Date</b>
AP Moeller-Maersk A/S - A Share	11-Apr-2013	GN Store Nord	19-Mar-2015
AP Moeller-Maersk A/S - A Share	31-Mar-2014	H. Lundbeck A/S	21-Mar-2013
AP Moeller-Maersk A/S - A Share	30-Mar-2015	IC Group A/S	24-Sept-2014
AP Moeller-Maersk A/S - B Share	11-Apr-2013	Novo Nordisk A/S	20-Mar-2013
AP Moeller-Maersk A/S - B Share	31-Mar-2014	Novo Nordisk A/S	20-Mar-2014
AP Moeller-Maersk A/S - B Share	30-Mar-2015	Novo Nordisk A/S	19-Mar-2015
Carlsberg A/S	21-Mar-2013	Novozymes A/S	28-Feb-2013
Carlsberg A/S	20-Mar-2014	Novozymes A/S	26-Feb-2014
Carlsberg A/S	26-Mar-2015	Novozymes A/S	25-Feb-2015
CHR Hansen Holding A/S	27-Nov-2012	Pandora A/S	19-Mar-2014
CHR Hansen Holding A/S	26-Nov-2013	Pandora A/S	18-Mar-2015
CHR Hansen Holding A/S	27-Nov-2014	TDC A/S	8-Aug-2012
Coloplast A/S	11-Dec-2012	TDC A/S	7-Mar-2013
Coloplast A/S	5-Dec-2013	TDC A/S	7-Aug-2013
Coloplast A/S	7-May-2014	TDC A/S	6-Mar-2014
Coloplast A/S	4-Dec-2014	TDC A/S	7-Aug-2014
Coloplast A/S	6-May-2015	TDC A/S	5-Mar-2015
Danske Bank A/S	18-Mar-2014	TDC A/S	7-Aug-2015

Danske Bank A/S	18-Mar-2015	Tryg A/S	18-Apr-2013
D/S Norden A/S	23-Apr-2014	Tryg A/S	3-Apr-2014
DSV A/S	12-Mar-2013	Tryg A/S	25-Mar-2015
DSV A/S	12-Mar-2015	Tryg A/S	12-Jul-2015
FLSmidth & Co. A/S	5-Apr-2013	Vestas Wind Systems	30-Mar-2015
FLSmidth & Co. A/S	26-Mar-2015		

### **REQUEST NO. 19**

Documents sufficient to identify how SKAT verified that withheld dividend tax refund claims submitted to SKAT related to or resulted from the collection of dividend withholding tax owed by publicly traded Danish companies.

### **REQUEST NO. 20**

All documents related to the payment of withheld dividend tax refunds to any U.S. pension plan that has not been denied a reclaim by SKAT and is not a defendant in the current multi-district litigation or any litigation against SKAT in the United States.

### **REQUEST NO. 21**

Documents sufficient to identify that SKAT paid withheld dividend tax refunds to individuals or entities other than the Plans with respect to the Shares.

### **REQUEST NO. 22**

All account statements relating to SKAT-owned or controlled bank accounts that paid the dividend withholding tax refunds to the Plans between 2012 and 2015, including account statements for any third-party banks that paid dividend withholding tax refunds related to the claims on behalf of SKAT between 2012 through 2015.

**REQUEST NO. 23**

All communications concerning SKAT and the Ministry of Taxation, the Ministry of Finance and/or the Public Accounts Committee regarding the payment of withheld dividend tax refunds between 2012 and 2015.

**REQUEST NO. 24**

All communications concerning SKAT and the Ministry of Taxation, the Ministry of Finance and/or the Public Accounts Committee regarding surpluses or deficits in SKAT's operating budget between 2012 and 2015.

**REQUEST NO. 25**

All employee handbooks, code of conduct, or code of ethics policies at SKAT and/or the Ministry of Taxation in effect between 2010 and 2015.

**REQUEST NO. 26**

All documents regarding changes in the amount of withheld dividend tax refunds paid by SKAT between 2012 and 2015, including any investigations, reports, or analyses conducted by SKAT, the Ministry of Finance, or the Public Accounts Committee.

**REQUEST NO. 27**

All documents maintained or owned by Solo Capital, affiliates of Solo Capital, Telesto, Old Park Lane, North Channel Bank, Indigo, West Point Derivatives, Ltd., and ED&F Man Capital Markets Ltd., including but not limited to, any bank account or brokerage statements relating to the above-listed entities, that are in SKAT's possession, custody or control.

**REQUEST NO. 28**

All communications concerning the trading of Shares by Solo Capital, affiliates of Solo Capital, Telesto, Old Park Lane, North Channel Bank, Indigo, West Point Derivatives, Ltd., and ED&F Man Capital Markets Ltd. that are in SKAT's possession, custody or control.

**REQUEST NO. 29**

All documents obtained by the Kingdom of Denmark from foreign government agencies relating to the Plans, Authorized Representatives, or Other Defendants and/or relied on by SKAT in support of the allegations of the complaints.

**REQUEST NO. 30**

The settlement agreement(s) between SKAT and 61 pension plans announced in May 2019.

**REQUEST NO. 31**

All pleadings and legal memoranda filed by or on behalf of SKAT in any court or other judicial or administrative proceeding in the world in support of any claim related to a refund of withheld dividend taxes on Danish listed securities.

**REQUEST NO. 32**

All affidavits, declarations, or other sworn statements submitted by or on behalf of SKAT in any court or other judicial or administrative proceeding in the world in support of any claim related to a refund of withheld dividend taxes on Danish listed securities.

Dated: January 17, 2020

/s/ Mark D. Allison, Esq.

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*Lead Counsel for the Defendants*

**Schedule A**

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-04047	The Bradley London Pension Plan	Doston Bradley		Syntax GIS	Solo Capital Partners LLP; Old Park Lane Capital PLC
18-cv-04049	The DMR Pension Plan	Doston Bradley		Syntax GIS; Acupay System LLC	Old Park Lane Capital PLC
18-cv-04050	The Houston Rocco LLC 401K Plan	Doston Bradley		Syntax GIS	Solo Capital Partners LLP; Old Park Lane Capital PLC
18-cv-04051	The Proper Pacific LLC 401K Plan	Doston Bradley		Goal TaxBack Limited	Telesto Markets LLP; Old Park Lane Capital PLC
18-cv-04052	The LBR Capital Pension Plan	Doston Bradley		Goal TaxBack Limited	West Point Derivatives Ltd; Old Park Lane Capital PLC
18-cv-04430	The Atlantic DHR 401K Plan	Doston Bradley		Acupay System LLC	Old Park Lane Capital PLC
18-cv-04434	The Stor Capital Consulting LLC 401K Plan	Michael Ben-Jacob		Goal TaxBack Limited	Telesto Markets LLP
18-cv-04522	The Busby Black 401K Plan	Doston Bradley		Syntax GIS	West Point Derivatives Ltd
18-cv-04531	The Canada Rock LLC 401K Plan	Doston Bradley		Syntax GIS	Old Park Lane Capital PLC
18-cv-04536	The ISDB Pension Plan	Doston Bradley		Syntax GIS	West Point Derivatives Ltd
18-cv-04538	The Monin Amper Pension Plan	Doston Bradley		Syntax GIS	Solo Capital Partners LLP
18-cv-04541	The NYC Stanismore Pension Plan	Doston Bradley		Syntax GIS	West Point Derivatives Ltd
18-cv-04543	The Texas Rocco LLC 401K Plan	Doston Bradley		Syntax GIS	Solo Capital Partners LLP
18-cv-04767	Sanford Villa Pension Plan	Roger Lehman		Syntax GIS	Old Park Lane Capital PLC
18-cv-04770	The Aston Advisors LLC 401K Plan	Roger Lehman		Syntax GIS	Telesto Markets LLP; Old Park Lane Capital PLC
18-cv-04771	The Sector 230 LLC 401K Plan	Jonathan Godson		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-04833	Raubritter LLC Pension Plan	Adam LaRosa		Acupay System LLC	Solo Capital Partners LLP
18-cv-04890	The M2F Wellness LLC 401K Plan	Mitchell Protass		Goal TaxBack Limited	Solo Capital Partners LLP

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-04892	The MPQ Holdings LLC 401K Plan	Mitchell Protass		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-04894	Sterling Alpha LLC 401(K) Profit Sharing Plan	John Doscas		Acupay System LLC	ED & F Man Capital Markets Limited; Solo Capital Partners LLP
18-cv-04896	The TKKJ LLC 401K Plan	Thomas Kertelits		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-04898	NYCATX LLC Solo 401K Plan	Carl Andrew Vergari		Acupay System LLC	Solo Capital Partners LLP
18-cv-04899	Sander Gerber Pension Plan	John Doscas		Acupay System LLC	Solo Capital Partners LLP
18-cv-04900	Ackview Solo 401K Plan	Sean Driscoll		Acupay System LLC	Solo Capital Partners LLP
18-cv-05045	The Dosmon Bly Pension Plan Doston	Doston Bradley		Goal TaxBack Limited	Telesto Markets LLP
18-cv-05053	The Goldstein Law Group PC 401(K) Profit Sharing Plan	Sheldon Goldstein		Goal TaxBack Limited	ED & F Man Capital Markets Limited
18-cv-05057	The India Bombay LLC 401K Pension Plan	Doston Bradley		Syntax GIS	Telesto Markets LLP
18-cv-05147	The Aria Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Telesto Markets LLP
18-cv-05150	The Belforte Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Solo Capital Partners LLP
18-cv-05151	The Bravos Advisors 401K Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Telesto Markets LLP
18-cv-05158	The Costello Advisors Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	West Point Derivatives Ltd
18-cv-05164	The Eskin Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Old Park Lane Capital PLC
18-cv-05180	The Fieldcrest Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Telesto Markets LLP
18-cv-05183	The Westport Advisors LLC 401K Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	West Point Derivatives Ltd
18-cv-05185	The Kodiak Capital Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Old Park Lane Capital PLC
18-cv-05186	The Kyber Pension Plan	Roger Lehman	Gavin Crescenzo	Acupay System LLC	Old Park Lane Capital PLC
18-cv-05188	The Lerici Capital Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Old Park Lane Capital PLC

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-05189	The Ludlow Holdings 401K Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Solo Capital Partners LLP
18-cv-05190	The Regoletth Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	West Point Derivatives Ltd
18-cv-05192	The Saba Capital LLC 401K Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Telesto Markets LLP
18-cv-05193	The West River Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	West Point Derivatives Ltd
18-cv-05194	The Stark Pension Plan	Roger Lehman	Gavin Crescenzo	Syntax GIS	Solo Capital Partners LLP
18-cv-05299	The Petkov Partners Pension Plan	Roger Lehman	Svetlin Petkov	Syntax GIS	West Point Derivatives Ltd
18-cv-05300	The Petkov Management LLC 401K Plan	Svetlin Petkov		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-05305	The SVP 401K Plan	Roger Lehman	Svetlin Petkov	Syntax GIS	Telesto Markets LLP
18-cv-05307	The Krabi Holdings LLC 401K Plan	Jonathan Godson	Gavin Crescenzo	Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-05308	he SPKK LLC 401K Plan	Roger Lehman	Svetlin Petkov	Syntax GIS	Old Park Lane Capital PLC
18-cv-05309	The KASV Group Pension Plan	Roger Lehman	Svetlin Petkov	Goal TaxBack Limited	Old Park Lane Capital PLC
18-cv-05374	Del Mar Asset Management Saving & Retirement Plan	David Freelove		Goal TaxBack Limited	ED & F Man Capital Markets Limited
18-cv-07824	Headsail Manufacturing LLC Roth 401K Plan	Robert Klugman		Acupay System LLC	Solo Capital Partners LLP; Old Park Lane Capital PLC
18-cv-07827	Edgepoint Capital LLC Roth 401K Plan	Robert Klugman		Syntax GIS	West Point Derivatives Ltd; Old Park Lane Capital PLC
18-cv-07828	Aerovane Logistics LLC Roth 401K Plan	Robert Klugman		Goal TaxBack Limited	Old Park Lane Capital PLC
18-cv-07829	The Random Holdings 401K Plan	Robert Klugman		Syntax GIS	West Point Derivatives Ltd; Old Park Lane Capital PLC
18-cv-08655	Federated Logistics LLC 401(K) Plan	Tatjana Vanjak	David Freelove	Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09434	SRH Farms LLC 401(K) Plan	Bluegrass Investment Management.	George Hofmeister	Global Equities GmbH	ED & F Man Capital Markets Limited

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
		LLC; Bernard Tew			
18-cv-09439	MGH Farms LLC 401(K) Plan	Bluegrass Investment Management. LLC; Bernard Tew	George Hofmeister	Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09489	JSH Farms LLC 401(K) Plan	Bluegrass Investment Management. LLC; Bernard Tew	George Hofmeister	Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09490	Triton Farms LLC 401(K) Plan	Bluegrass Investment Management. LLC; Bernard Tew	George Hofmeister	Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09491	KRH Farms LLC 401(K) Plan	Bluegrass Investment Management. LLC; Bernard Tew	George Hofmeister	Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09492	Tew, LP Retirement Plan	Vincent Tew		Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09494	Tew Enterprises, LLC Retirement Plan	Andrea Tew		Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09497	Industrial Pensions Group Trust	Bluegrass Investment Management. LLC; Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited; BNP Paribas
18-cv-09498	Casting Pensions Group Trust	Bluegrass Investment Management. LLC; Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited; BNP Paribas
18-cv-09505	SV Holdings, LLC Retirement Plan	Stephanie Tew		Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09507	Central Technologies Pensions Group Trust	Bluegrass Investment Management. LLC; Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited; BNP Paribas
18-cv-09511	Bluegrass Retirement Group Trust	Bluegrass Investment Management. LLC; Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited; Argon Markets

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-09515	Bluegrass Investment Management, LLC Retirement Plan	Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09549	Autoparts Pensions Group Trust	Bluegrass Investment Management, LLC; Bernard Tew		Global Equities GmbH	ED & F Man Capital Markets Limited; BNP Paribas
18-cv-09552	MSJJ Retirement Group Trust	Bluegrass Investment Management, LLC; Bernard Tew		George Hofmeister Global Equities GmbH	ED & F Man Capital Markets Limited
18-cv-09565	The 78 Yorktown Pension Plan	Roger Lehman		Syntax GIS	West Point Derivatives Ltd
18-cv-09570	The Cambridge Town Line Pension Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP
18-cv-09587	The Diamond Scott Capital Pension Plan	Roger Lehman		Syntax GIS	Old Park Lane Capital PLC; Telesto Markets LLP
18-cv-09588	The Hotel Fromance Pension Plan	Roger Lehman		Syntax GIS	Old Park Lane Capital PLC
18-cv-09589	The Mountain Air LLC 401K Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP; Old Park Lane Capital PLC
18-cv-09590	The SKSL LLC Pension Plan	Roger Lehman		Goal Taxback Limited	Old Park Lane Capital PLC; Telesto Markets LLP
18-cv-09650	The Snow Hill Pension Plan	Roger Lehman		Goal Taxback Limited	West Point Derivative Ltd; Old Park Lane Capital PLC
18-cv-09665	The Westridge Ave LLC 401K Plan	Roger Lehman		Syntax GIS	Telesto Markets LLP
18-cv-09666	The Shapiro Blue Management LLC 401K Plan	Roger Lehman		Acupay System LLC	Old Park Lane Capital PLC
18-cv-09668	The Patrick Partners Conglomerate Pension Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP
18-cv-09669	CSCC Capital Pension Plan	Roger Lehman		Acupay System LLC	Old Park Lane Capital PLC

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-09797	DW Construction, Inc. Retirement Plan	Stacey Kaminer		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09836	Kamco Investments, Inc. Pension Plan	Stacey Kaminer		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09837	Kamco LP Profit Sharing Pension Plan	Stacey Kaminer		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09838	Linden Associates Defined Benefit Plan	Joan Schulman		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09839	Moira Associates LLC 401 (K) Plan	Stacey Kaminer		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09840	Riverside Associates Defined Benefit Plan	David Schulman		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-09841	American Investment Group of New York, L.P. Pension Plan	Stacey Kaminer		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-10028	The Cardinal Consulting Pension Plan	Matthew Tucci		Goal TaxBack Limited	Telesto Markets LLP
18-cv-10030	The Egret Associates LLC 401K Plan	Matthew Tucci		Syntax GIS	West Point Derivatives Ltd
18-cv-10031	The Crow Associates Pension Plan	Matthew Tucci		Syntax GIS	Solo Capital Partners LLP
18-cv-10032	The Heron Advisors Pension Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC
18-cv-10035	The Hoboken Advisors LLC 401K Plan	Matthew Tucci		Goal TaxBack	Limited Old Park Lane Capital PLC
18-cv-10036	The Jayfran Blue Pension Plan	Matthew Tucci		Syntax GIS	West Point Derivatives Ltd
18-cv-10039	The JT Health Consulting LLC 401K Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC
18-cv-10049	The Lakeview Advisors 401K Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC; Solo Capital Partners LLP
18-cv-10060	The Osprey Associates LLC 401K Plan	Matthew Tucci		Syntax GIS	Solo Capital Partners LLP

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-10061	The Sandpiper Pension Plan	Matthew Tucci		Syntax GIS	Telesto Markets LLP
18-cv-10062	The Zen Training LLC 401(K) Plan	Matthew Tucci		Goal TaxBack Limited	Telesto Markets LLP; Old Park Lane Capital PLC
18-cv-10063	The Everything Clean LLC 401K Plan	Matthew Tucci		Acupay System	LLC West Point Derivatives Ltd; Old Park Lane Capital PLC
18-cv-10064	The Jump Group LLC 401K Plan	Matthew Tucci		Acupay System LLC	Solo Capital Partners LLP
18-cv-10065	The Oaks Group Pension Plan	Matthew Tucci		Acupay System LLC	Solo Capital Partners LLP
18-cv-10066	The Wave Maven LLC 401K Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC
18-cv-10067	The Balmoral Management LLC 401K Pension Plan	John LaChance		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-10069	The Beech Tree Partners 401K Plan	Matthew Tucci		Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-10070	The Blackbird 401K Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC
18-cv-10071	The Chambers Property Management LLC 401K Plan	Matthew Tucci		Acupay System LLC	Old Park Lane Capital PLC; Telesto Markets LLP
18-cv-10073	FiftyEightSixty LLC Solo 401K Plan	Matthew Tucci		Acupay System LLC	Solo Capital Partners LLP
18-cv-10074	The Hawk Group Pension Plan	Matthew Tucci		Acupay System LLC	Telesto Markets LLP
18-cv-10076	The Hibiscus Partners LLC 401K Plan	Matthew Tucci		Goal TaxBack Limited	Old Park Lane Capital PLC; Telesto Markets LLP; Solo Capital Partners LLP
18-cv-10077	The Maple Advisors LLC 401K Plan	Matthew Tucci		Syntax GIS	Solo Capital Partners LLP; Telesto Markets LLP
18-cv-10080	OneZeroFive LLC Solo 401K Plan	Matthew Tucci		Acupay System LLC	Solo Capital Partners LLP
18-cv-10082	The Sea Bright Advisors LLC 401K Plan	Matthew Tucci		Goal TaxBack Limited	West Point Derivatives Ltd; Old Park Lane Capital PLC
18-cv-10083	The Tag Realty Advisors LLC 401K Plan	Matthew Tucci		Syntax GIS	Old Park Lane Capital PLC; Solo

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
					Capital Partners LLP
18-cv-10086	The Throckmorton Advisors 401K Plan	Matthew Tucci		Acupay System LLC	Solo Capital Partners LLP; West Point Derivatives Ltd
18-cv-10088	Acorn Capital Corporation Employee Profit Sharing Plan; and Acorn Capital Strategies LLC Employee Pension Profit Sharing Plan & Trust	Gregory Summers		Acupay System LLC	Solo Capital Partners LLP; ED & F Man Capital Markets Limited
18-cv-10090	Cambridge Way LLC 401K Profit Sharing Plan	Shreepal Shah		Acupay System LLC	ED & F Man Capital Markets Limited
18-cv-10091	The Dink 14 LLC 401K Plan	Jonathan Godson	Vincent Natoli	Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-10092	JML Capital LLC 401K Plan	Roger Lehman	John LaChance	Syntax GIS	Old Park Lane Capital PLC
18-cv-10093	Natoli Management Pension Plan	Roger Lehman	Vincent Natoli	Syntax GIS	Old Park Lane Capital PLC
18-cv-10094	Nova Fonta Trading LLC 401K Plan	Roger Lehman	Vincent Natoli	Syntax GIS	Old Park Lane Capital PLC
18-cv-10095	The Skybox LLC 401K Plan	Jonathan Godson	Bradley Crescenzo	Goal TaxBack Limited	Solo Capital Partners LLP
18-cv-10096	The Robin Daniel Pension Plan	Matthew Tucci		Goal TaxBack Limited	West Point Derivatives Ltd
18-cv-10098	The FWC Capital LLC Pension Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP; Old Park Lane Capital PLC
18-cv-10099	The RDL Consulting Group LLC Pension Plan	Roger Lehman		Syntax GIS	Old Park Lane Capital PLC
18-cv-10100	Newsong Fellowship Church 401(K) Plan	Alexander Jamie Mitchell III		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-10118	Cole Enterprises USA Retirement Plan Trust	Todd Bergeron		Goal Taxback Limited	Salgado Capital
18-cv-10119	Blackrain Pegasus LLC Solo 401K Plan	Doston Bradley		Acupay System LLC	Solo Capital Partners LLP

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker-Custodian(s)
18-cv-10122	Gyos 23 LLC Solo 401K Plan	Doston Bradley		Acupay System LLC	Solo Capital Partners LLP
18-cv-10123	The Oak Tree One 401K Plan	Doston Bradley		Goal Taxback Limited	Telesto Markets LLP
18-cv-10124	The Joanne E. Bradley Solo 401K Plan	Doston Bradley		Acupay System LLC	Solo Capital Partners LLP
18-cv-10125	Delgado Fox LLC Solo 401K Plan	Doston Bradley		Acupay System LLC	Solo Capital Partners LLP
18-cv-10126	Pegasus Fox 23 LLC Solo 401K Plan	Doston Bradley		Acupay System LLC	Solo Capital Partners LLP
18-cv-10127	KK Law Firm Retirement Plan Trust	Kevin Kenning		Goal Taxback Limited	ED & F Man Capital Markets Limited; Investec
18-cv-10129	The Valerius LLC Solo 401K Plan	Roger Lehman		Goal Taxback Limited	Solo Capital Partners LLP
18-cv-10130	Tveter LLC Pension Plan	Christopher Nowell		Goal Taxback Limited	ED & F Man Capital Markets Limited
18-cv-10133	The Sinclair Pension Plan	Roger Lehman		Syntax GIS	West Point Derivatives Ltd
18-cv-10134	The Green Group Site Pension Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP
18-cv-10135	The Mueller Investments Pension Plan	Roger Lehman		Syntax GIS	Solo Capital Partners LLP
18-cv-10136	The Bella Consultants Pension Plan	Roger Lehman		Syntax GIS	Telesto Markets LLP
18-cv-10137	Blue Ocean Equity LLC Retirement Plan Trust	Kevin Kenning		Goal Taxback Limited	Salgado Capital

### Schedule B

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker – Custodian(s)
19-cv-01867	Avanix Management LLC Roth 401(K) Plan	Richard Markowitz	Richard Markowitz	Acupay System LLC	Solo Capital Partners LLP
19-cv-01895	Batavia Capital Pension Plan	“Non-party Authorized Representative”	Richard Markowitz	Acupay System LLC	Solo Capital Partners LLP
19-cv-01904	Calypso Investments Pension Plan	“Non-party Authorized Representative”	Jocelyn Markowitz	Goal Taxback Limited	Solo Capital Partners LLP
19-cv-01869	Cavus Systems LLC Roth 401(K) Plan	Richard Markowitz	Richard Markowitz; Michael Ben-Jacob	Goal Taxback Limited	Telesto Markets LLP
19-cv-01868	Hadron Industries LLC Roth 401(K) Plan	Richard Markowitz	Richard Markowitz	Syntax GIS	West Point Derivatives Ltd
19-cv-01898	RJM Capital Pension Plan	“Non-party Authorized Representative”	Richard Markowitz	Goal Taxback Limited	Solo Capital Partners LLP
19-cv-01896	Routt Capital Pension Plan	Richard Markowitz	Richard Markowitz	Acupay System LLC; Syntax GIS	Old Park Lane Capital PLC
19-cv-01906	Michelle Investments Pension Plan	John van Merkensteijn	Richard Markowitz; John van Merkensteijn	Acupay System LLC	Solo Capital Partners LLP
19-cv-01911	Remece Investments LLC Pension Plan	“Non-party Authorized Representative”	Richard Markowitz; John van Merkensteijn	Goal Taxback Limited	Solo Capital Partners LLP
19-cv-01924	Xiphias LLC Pension Plan	John van Merkensteijn	Richard Markowitz; John van Merkensteijn	Acupay System LLC	Solo Capital Partners LLP
19-cv-01893	Azalea Pension Plan	“Non-party Authorized Representative”	Elizabeth van Merkensteijn	Acupay System LLC	Solo Capital Partners LLP
19-cv-01866	Basalt Ventures LLC Roth 401(K) Plan	John van Merkensteijn	John van Merkensteijn	Goal Taxback Limited	Telesto Markets LLP
19-cv-01865	Bernina Pension Plan	John van Merkensteijn	John van Merkensteijn	Acupay System LLC	Solo Capital Partners LLP
19-cv-01894	Omineca Pension Plan	Michael Ben-Jacob	John van Merkensteijn; Michael Ben-Jacob	Acupay System LLC; Goal TaxBack Limited	Solo Capital Partners LLP
19-cv-01871	Starfish Capital Management	John van Merkensteijn	John van Merkensteijn	Syntax GIS	Old Park Lane Capital PLC

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker – Custodian(s)
	LLC Roth 401(K) Plan				
19-cv-01930	Tarvos Pension Plan	“Non-party Authorized Representative”	John van Merkensteijn	Goal Taxback Limited	Solo Capital Partners LLP
19-cv-01873	Voojo Productions LLC Roth 401(K) Plan	John van Merkensteijn	John van Merkensteijn	Acupay System LLC	Old Park Lane Capital PLC
19-cv-01785	Albedo Management LLC Roth 401(K) Plan	Michael Ben-Jacob	Joseph Herman; Michael Ben-Jacob	Acupay System LLC	Old Park Lane Capital PLC
19-cv-01781	Ballast Ventures LLC Roth 401(K) Plan	Michael Ben-Jacob	Joseph Herman; Michael Ben-Jacob	Acupay System LLC	Telesto Markets LLP
19-cv-01791	Fairlie Investments LLC Roth 401(K) Plan	Joseph Herman	Joseph Herman; Michael Ben-Jacob	Goal TaxBack Limited	West Point Derivatives Ltd
19-cv-01783	Bareroot Capital Investments LLC Roth 401(K) Plan	David Zelman	David Zelman; Michael Ben-Jacob	Syntax GIS	Telesto Markets LLP
19-cv-01794	Battu Holdings LLC Roth 401K Plan	Michael Ben-Jacob	David Zelman; Michael Ben-Jacob	Acupay System LLC	Old Park Lane Capital PLC
19-cv-01798	Cantata Industries LLC Roth 401(K) Plan	David Zelman	David Zelman; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01788	Dicot Technologies LLC Roth 401(K) Plan	David Zelman	David Zelman; Michael Ben-Jacob	Syntax GIS	West Point Derivatives Ltd
19-cv-01918	Vanderlee Technologies Pension Plan	Michael Ben-Jacob	David Zelman; Michael Ben-Jacob	Acupay System LLC; Goal TaxBack Limited	Solo Capital Partners LLP
19-cv-01922	Cedar Hill Capital Investments LLC Roth 401(K) Plan	Edwin Miller	Edwin Miller; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01928	Fulcrum Productions LLC Roth 401(K) Plan	Edwin Miller	Edwin Miller; Michael Ben-Jacob	Syntax GIS	Telesto Markets LLP
19-cv-01926	Green Scale Management LLC Roth 401(K) Plan	Michael Ben-Jacob	Edwin Miller; Michael Ben-Jacob	Acupay System LLC	Old Park Lane Capital PLC

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker – Custodian(s)
19-cv-01929	Keystone Technologies LLC Roth 401(K) Plan	Edwin Miller	Edwin Miller; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01931	Tumba Systems LLC Roth 401(K) Plan	Edwin Miller	Edwin Miller; Michael Ben-Jacob	Syntax GIS	West Point Derivatives Ltd
19-cv-01800	Crucible Ventures LLC Roth 401(K) Plan	Ronald Altbach	Ronald Altbach; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01803	Limelight Global Productions LLC Roth 401(K) Plan	Ronald Altbach	Ronald Altbach; Michael Ben-Jacob	Syntax GIS	Telesto Markets LLP
19-cv-01809	Plumrose Industries LLC Roth 401K Plan	Michael Ben-Jacob	Ronald Altbach; Michael Ben-Jacob	Acupay System LLC	Old Park Lane Capital PLC
19-cv-01812	Roadcraft Technologies LLC Roth 401(K) Plan	Ronald Altbach	Ronald Altbach; Michael Ben-Jacob	Goal TaxBack Limited	Solo Capital Partners LLP
19-cv-01818	True Wind Investments LLC Roth 401(K) Plan	Ronald Altbach	Ronald Altbach; Michael Ben-Jacob	Syntax GIS	West Point Derivatives Ltd
19-cv-01870	Eclouge Industry LLC Roth 401(K) Plan	Perry Lerner	Perry Lerner; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01792	First Ascent Worldwide LLC Roth 401(K) Plan	Perry Lerner	Perry Lerner; Michael Ben-Jacob	Syntax GIS	Telesto Markets LLP
19-cv-01806	Loggerhead Services LLC Roth 401(K) Plan	Michael Ben-Jacob	Perry Lerner; Michael Ben-Jacob	Acupay System LLC	Solo Capital Partners LLP
19-cv-01808	PAB Facilities Global LLC Roth 401(K) Plan	Perry Lerner	Perry Lerner; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01815	Trailing Edge Productions LLC Roth 401(K) Plan	Perry Lerner	Perry Lerner; Michael Ben-Jacob	Syntax GIS	West Point Derivatives Ltd
19-cv-01801	Monomer Industries LLC Roth 401(K) Plan	Robin Jones	Robin Jones; Michael Ben-Jacob	Goal TaxBack Limited	Old Park Lane Capital PLC
19-cv-01810	Pinax Holdings LLC Roth 401(K) Plan	Robin Jones	Robin Jones; Michael Ben-Jacob	Syntax GIS	Telesto Markets LLP

Case Number	Plan	Authorized Representative	Other Defendant(s)	Payment Agent(s)	Broker – Custodian(s)
19-cv-01813	Sternway Logistics LLC Roth 401(K) Plan	Robin Jones	Robin Jones; Michael Ben- Jacob	Syntax GIS	West Point Derivatives Ltd